

**Part C State Performance Plan (SPP) for 2005-2010**

Overview of the State Performance Plan Development: see Overview of Kentucky's State Performance Plan Development Process document.

*(The following items are to be completed for each monitoring priority/indicator.)*

**Monitoring Priority: EFFECTIVE GENERAL SUPERVISION PART C / GENERAL SUPERVISION**

**Indicator 14 – State reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate. (20 U.S.C. 1416(a)(3)(B) and 1442)**

**Measurement: State reported data, including 618 data, State Performance Plan, and annual Performance reports, are:**

- a. Submitted on or before due dates (February 1 for child count, including race and ethnicity, settings and November 1 for exiting, personnel, dispute resolution); and
- b. Accurate (describe mechanisms for ensuring accuracy).

**Overview of Issue/Description of System or Process:**

All data in the section 618 tables comes from Kentucky's Central Billing and Information System (CBIS) database. CBIS maintains billing and demographic records for all children served under Part C in the state of Kentucky. When a child enters one of the fifteen district points of entry, paper forms are submitted by initial service coordinators (ISCs) to notify CBIS about the child. ISCs submit routine demographic and contact information for the child, as well as authorizations for service payment. These are entered manually at CBIS. Evaluators and other providers contract with the state for services. When they receive a First Steps referral, they deliver service and bill CBIS. Some providers send paper billing, others bill electronically. Paper bills are entered manually at CBIS. Electronic billing is imported into the database. Many of these providers go on to become part of the IFSP team. Once an IFSP is in place, primary service coordinators (PSCs) continue to submit paper authorization forms and demographic updates to CBIS.

CBIS has procedures in place to limit data entry errors (and is by contract required to do so). Having all data entry take place in one location also has the advantage of providing oversight and supervision of staff.

Initial and primary service coordinators receive training before they can become service coordinators on how to properly complete the CBIS forms. ISCs attend quarterly point of entry meetings where any new updates to forms can be discussed and questions can be answered. Primary service coordinators must attend mandatory quarterly meetings which serve the same purpose.

In the letter from OSEP to Secretary James Holsinger in response to Kentucky's FFY 2003 APR, it was requested that Kentucky respond to a previous request to provide explanation of a flawed data report in the FFY 2002 APR. The "flawed data" had to do with data regarding the 45 day timeline and the percentage of IFSP services that are delivered. The FFY 2002 APR was in error. The data are not flawed. This error came about due to miscommunication between the director of the Central Billing and Information System (CBIS) who serves as the data manager (and is contracted rather than a state employee) and the lead agency at the time (the lead agency has since changed). The data manager was not included in the writing of the FFY 2002 APR, nor informed of the purpose and importance of the document. And at the same time, the data manager was providing data for the

imminent change in lead agencies. The data manager included a statement to the then lead agency that data cleaning was involved with the 45 day timeline data to make sure that children originally determined not eligible and subsequently re-referred did not get days counted from the original referral, resulting in an inordinately (and inaccurately) long time period from referral to IFSP. The data manager completed this data cleaning before reporting the data to the then lead agency. In particular, the data manager looked at the electronic record of **every** referral that seemed to be a long period of time to ensure the dates were correct. But because of the statement that cleaning was necessary; the lead agency reported that the data were flawed. On the contrary, the data were exceptionally accurate. Specifically, the number of days from referral to IFSP was **not** overstated for the reason described above. Service coordinators might have made mistakes on re-referrals, but those were data-cleaned. The number of referrals was likewise not over-reported. The data manager in the data cleaning process ensured each child was only counted once. The FFY 2002 APR also indicated that the data report failed to capture reasons for not meeting the 45 day requirement. This is true, because the data requested came from the billing system. The lead agency was instructed by the data manager that reasons for not meeting the 45 day requirement should be obtained through the monitoring process.

As to the reported flaw in data which capture the percentage of IFSP services that are delivered, the then lead agency was told by the data manager that since the request came to the billing system, the actual IFSP was not available. The actual IFSP in Kentucky is kept in the child's permanent record at the Point of Entry. Services authorized on the IFSP are translated into billing codes and entered onto a Summary Sheet (which summarizes the IFSP services) for CBIS. As a billing system without access to the IFSP itself, it was impossible for CBIS to provide the information in the manner they had requested it. CBIS suggested the lead agency use monitoring data instead. But instead the then lead agency chose to use the CBIS data as it could be best conceived and report it as flawed.

In the section of this document under Indicator 7, Kentucky has reported how we are attempting to correct the problem of not tracking reasons the 45 day timeline is missed. We did complete a survey of all cases where the 45 day timeline was not in compliance with Federal Part C regulations. In the future, we will add fields and tables to the CBIS database to continually track and monitor this data. The data manager at CBIS is now part of the SPP and APR process so communication has been greatly improved.

**Baseline Data for FFY 2004 (2004-2005): ALL DATA WERE SUBMITTED TIMELY.**

#### **Discussion of Baseline Data:**

All data required to be submitted to OSEP was completed in a timely way. For the Section 618 data, Tables 2-5 for the December 1, 2003 child count were due November 1, 2004. They were submitted electronically to Westat, who confirmed receipt of same on that day. Westat returned a report showing significant year-to-year changes for tables 3 and 5. A response was made to this immediately upon receipt. Table 1 for the December 1, 2004 child count was due February 1, 2005. It was submitted January 13, 2005 electronically to Westat, who confirmed receipt of same the next day. No significant year-to-year changes were noted by Westat that required a response, so none was made.

The 2004 APR was due March 30, 2005. This was completed and submitted on March 24, 2005 to OSEP.

FFY	Measurable and Rigorous Target
<b>2005</b> (2005-2006)	<b>100% of state reported data (618 and State Performance Plan and Annual Performance Report) will be timely and accurate.</b>
<b>2006</b> (2006-2007)	<b>100% of state reported data (618 and State Performance Plan and Annual Performance Report) will be timely and accurate.</b>
<b>2007</b> (2007-2008)	<b>100% of state reported data (618 and State Performance Plan and Annual Performance Report) will be timely and accurate.</b>
<b>2008</b> (2008-2009)	<b>100% of state reported data (618 and State Performance Plan and Annual Performance Report) will be timely and accurate.</b>
<b>2009</b> (2009-2010)	<b>100% of state reported data (618 and State Performance Plan and Annual Performance Report) will be timely and accurate.</b>
<b>2010</b> (2010-2011)	<b>100% of state reported data (618 and State Performance Plan and Annual Performance Report) will be timely and accurate.</b>

**Improvement Activities/Timelines/Resources:**

IMPROVEMENT ACTIVITY	TIMELINE	RESOURCES
1. Kentucky will continue to contract with a data manager to assure that data reports are timely and accurate	July 2005 – June 2011	Kentucky Department for Public Health; Contracted Data Manager
2. Part C Coordinator will manage production of all required reports to meet timelines.	July 2005 – June 2011	Part C Coordinator